



August 13, 2024

**VIA EMAIL:** [Chambers\\_of\\_Judge\\_Paul\\_S\\_Diamond@paed.uscourts.gov](mailto:Chambers_of_Judge_Paul_S_Diamond@paed.uscourts.gov)

Chambers of Judge Paul S. Diamond  
14614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

RE: *Theia Technologies LLC v. Theia Group, Inc. et al.*, Civ. No. 2:20-cv-00097-PSD  
Our Docket No. 8941.0063

Dear Judge Diamond:

I represent Plaintiff, Theia Technologies LLC in the above matter. The parties entered into a settlement agreement on June 28, 2021, resolving all matters, and including a provision agreeing to the entry of a consent decree. Before that consent decree was entered, satellite litigation arose in which a receiver for Theia Group was appointed. It is our understanding that the Theia Group assets were sold in the course of that receivership and on information and belief the Theia Group entity no longer exists.

I reached out to the last known Pennsylvania counsel for Theia Group, Sean McConnell, and copied Mr. Tillery who appears to have left the firm that was representing Theia Group, to try to confirm my understanding that Theia Group no longer exists and to find out if counsel were authorized to act on behalf of either Theia Group or any success-or-interest through the receivership. I have not heard back in response to that communication. In view of the Court's recent orders, I am writing to provide an update on the status as I understand it.

At this point, assuming Theia Group does not in fact continue to exist and counsel is not authorized to act on behalf of any party with an interest in this matter, which I am hopeful counsel can confirm to the Court, as suggested in the Court's Order dated August 6, 2024, Plaintiff would consent to a dismissal without prejudice.

Sincerely,

A handwritten signature in black ink that reads 'Hillary A. Brooks'.

Hillary A. Brooks

☐ **Contact Us**  
(503) 629-1559  
[hillary@brooksquinn.com](mailto:hillary@brooksquinn.com)

☐ **Brooks Quinn LLC**  
2900 NW Clearwater Dr., Ste. 200-66  
Bend, OR 97703